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February 2, 2009

Mr. Wayne Yoshioka, Director
Department of Transportation Services
650 South King Street, 3rd Floor
Honolulu, HI 96813

Dear Mr. Yoshioka:

Wayne
Re: Comments Relating to the Draft Environmental Impact Statement (DEIS) for the Honolulu Rail Transit Project

Thank you for this opportunity to submit final comments on the aforementioned project on behalf of residents in my district.

My concerns include the following:

- I. Ridership Estimates
- II. First Segment from East Kapolei to Waipahu
- III. Alternative First Segment: Downtown to Kapolei
- IV. General Excise Tax Collection
- V. Construction Costs
- VI. Operation & Maintenance Costs
- VII. Transit-Oriented Development
- VIII. Other Concerns and Questions

I. RIDERSHIP ESTIMATES

The DEIS lists ridership for the airport alignment as 95,310 daily passengers by the Year 2030 and 87,570 daily passengers by 2030 for the Salt Lake Boulevard alignment (SLB). I am skeptical of both ridership projections, in view of the following:

A. Airport Visitors

Based on data from the Hawaii Tourism Authority, Hawaii has about 7 million mainland and international visitors each year. Of this amount, 71 percent go through Honolulu International

Airport, while the remaining 29 percent go to the neighbor islands. Asian visitors, the majority of whom are Japanese, total approximately 2 million. Japanese visitors usually come in a tour group with a tour package, which includes airline, hotel and ground transportation, and attractions. They usually arrive in the morning. However, because check-in time at the hotel is in the afternoon, ground transportation is waiting for them to take them shopping or elsewhere until check-in. Therefore, they will not be likely to take the rail. **Do ridership projections for the airport alignment take into consideration these figures?**

There are other factors that may discourage visitors from riding the rail. First, the proposed passenger station on Aolele Street is too far away from the passenger terminals.

- **What is the distance from the passenger station on Aolele Street to the domestic and international terminals? To the interisland terminal?**
- **When passengers disembark at the station on Aolele Street, how will they get to both passenger terminals? Will a walkway be built? If so, what's the estimated cost and who will be responsible for the costs of building and maintaining the walkway?**

A second major factor that may discourage visitors from riding rail is that the rail line does not extend into Waikiki where a large majority of our visitors are staying. Having mentioned the above disincentives, **please provide a breakdown in the number of visitors who are expected to ride the airport alignment. Will there be luggage compartments on the train to accommodate our visitors?** Ron Tober, chair of the panel of experts who selected the technology for the rail system, noted several dead periods while personally observing passenger traffic at the airport. Mr. Tober also suggested that the Salt Lake alignment would provide for a better ridership base than the airport. **To get a better gauge on visitor numbers, what are the frequencies for visitor arrivals?**

B. Airport Employees

As for airport employees, there are about 727 state and 15,000 private sector workers at the airport. There are several factors that may discourage employees from riding the rail, foremost of which are the 7,000-plus parking stalls at the airport, which includes the State's new \$43 million, 8-level 1,800-stall parking structure, which was built to accommodate future increases in the number of people who use the airport. A good number of State and private sector employees have designated parking stalls at the airport. Furthermore, for security reasons, airlines' crewmembers have their own shuttle service to and from their hotels and back. In view of this, **please provide a breakdown in the number of airport employees who are expected to ride the airport alignment.**

C. Pearl Harbor and Hickam Employees

There are approximately 12,500 civilian employees combined at Pearl Harbor and Hickam. Please note that firstly, these civilian employees already enjoy the convenience of free parking on base. Secondly, the passenger station at Radford Drive is located outside of the base on Kamehameha Highway. To get to their workplace, employees must walk over a mile onto the base. Thirdly, most military personnel either live on base or within a short driving distance. Those who live further away understandably prefer to drive for convenience and emergency purposes. Having mentioned the above, **please provide a breakdown in the number of civilian employees, contractors and military personnel who are expected to ride the airport alignment. Do the ridership numbers take into account these factors?**

D. Population Estimates From Aloha Stadium to Middle Street

The DEIS on page 4-39 lists the population in the Year 2000 for the transit corridor at about 552,100 and the population of the Aliamanu-Salt Lake area at more than 54,000. If residents in Foster Village and lower Halawa are included, along with several new condo and other housing development makai of Salt Lake Boulevard, the population count will surely be higher—possibly between 60,000 – 70,000. If you add shoppers and employees in the Mapunapuna industrial area, at Salt Lake Shopping Center, Stadium Mall, KMart and the new Target department store (which opens in March 2009), the numbers are quite substantial and add to the daily ridership count.

With the above facts stated, I strongly believe that the over 60,000 residents who live along the 4-mile stretch of Salt Lake Boulevard and those who work and shop in the area—including the new Target store which will open by March 2009—represent a solid and dependable ridership base. These are locals who will ride the rail despite a bad economy.

To get a more accurate picture of population and ridership levels for the Salt Lake Boulevard and airport alignments, please provide answers to the following:

- What is the projected population count for both alignments only for that portion of the MOS between the Middle Street Transit Center and the Aloha Stadium by the Year 2018 and the Year 2030?
- Out of the 95,310 estimated daily riders for the airport alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.
- Out of the 87,570 estimated daily riders for the Salt Lake Boulevard alignment, how many passenger boardings are attributed only for that portion between Aloha Stadium and the Middle Street Transit Center when the MOS is completed by 2018? By 2030? Please detail the methods used to arrive at those figures.

II. FIRST SEGMENT FROM EAST KAPOLEI TO WAIPAHU

I question the rationale for building the first segment from East Kapolei to Waipahu, particularly when it will do little to relieve traffic since gridlock begins where H-1 and H-2 merge. I am convinced that this MOS first segment: 1) will fall woefully short of bringing most commuters to their intended destination of urban Honolulu and beyond; and 2) will cost taxpayers more money, and this scenario will continue until you reach Downtown.

In view of the above, when completed, 1) Who will ride this first segment? 2) What is the estimated ridership for the first segment? 3) What's the estimated funding to complete the first segment from East Kapolei to Waipahu? 4) What is your estimated operation & maintenance costs? 5) What is the estimated taxpayer subsidy for operation & maintenance costs for this first segment? Please justify your numbers.

III. ALTERNATIVE FIRST SEGMENT: DOWNTOWN TO KAPOLEI

Ron Tober, chair of the technology selection panel, in testimony before the Council's transportation committee on February 22, 2008, stated his preference to begin the project from

Downtown towards Kapolei rather than from Kapolei towards Downtown. I support Tober's preference.

It seems that finding a suitable baseyard has been a major sticking point for the administration. **Has the City considered construction of a subsidiary or layover baseyard? Can the City later build a permanent baseyard adjacent to the Leeward Community College when the transit line is extended to Waipahu and beyond?**

Since the City already owns the Middle Street Transit Center, could a portion be used as a subsidiary or layover baseyard? There are several reasons for this:

- The transit line will connect to the Middle Street property.
- A subsidiary or layover baseyard could serve as a back-up in case operations at the permanent backyard are halted for any reason.
- The full use of the 100 rail cars for the entire 20-mile long first segment as stated in the DEIS will not be required, since the initial segment of the MOS may only be between 6-8 miles long and not the full 20 miles.
- The design and planning for a subsidiary or layover baseyard can still be incorporated into the overall design and plans for the Middle Street property.

Could a subsidiary or layover baseyard for rail double up to potentially service (repair, maintain and clean) existing City buses and handivans? How many rail cars are needed to service the approximately 6-8 mile long initial segment of the MOS?

IV. GENERAL EXCISE TAX COLLECTION

According to an article in the December 11, 2008, edition of the Honolulu Advertiser, the latest transit tax collection numbers are down from last year due to the bad economy. For the first 20 months of the tax collection, the total amount is \$246 million, or \$12.3 million per month. Over the 15-year period of General Excise Tax (GET) collection, or 180 months, the City can expect a total of \$2.2 billion in GET revenues, which is way short of the \$4.054 billion projected in the DEIS. So far, things aren't working out as planned. According to a Honolulu Advertiser article dated January 27, 2009, GET collections for the first half of Fiscal Year 2009 were down nearly 6 percent to \$79.4 million (not including the 10 percent collected by the State).

Page 6-4 of the DEIS states that general excise tax surcharge revenues are estimated to be \$4.054 billion (YOE \$) through FY 2023. For purposes of clarity, please note that Act 247 authorizing the half percent GET collection will be repealed on December 31, 2022—not through Fiscal Year 2023. **What are you basing the amount (\$4.054 billion) on? Please provide yearly projections for the half percent GET collection and justifications for those projections.**

Currently, debate on the cost of the 20-mile MOS in today's dollars, ranges from a low of \$3.7 billion to about \$5.3 billion. The administration maintains that the estimated amount of \$3.7 billion, which includes a contingency of \$1 billion, is enough to complete the MOS. **With declining GET collection and added cost (airport alignment) comes the question: in case of a deficit in GET collection, how will the City make up the difference?**

V. CONSTRUCTION COSTS

The airport route costs \$220 million more than the Salt Lake Boulevard (SLB) route plus \$75M for double decking the Lagoon Drive rail station. For the sake of our taxpayers, we need to carefully analyze whether funding estimates are what we can truly afford. If not, we run the risk of repeating the experiences of cities such as Denver, Colorado. Extending Denver's FasTracks system, which was estimated in 2002 to cost \$4.7 billion, now costs \$7.9 billion. Denver officials are now contemplating whether to raise their sales tax to fund this increase. **In light of this, how confident are the administration and city consultants that the \$3.7 billion price tag, which includes a \$1 billion contingency, is more than enough to complete the MOS? Would the administration be willing to allow the City Council to cap MOS funding to no more than \$3.7 billion? If not, please explain.**

Per the DEIS, we are unsure of the amount of funding that we will receive from the federal government. **To save taxpayer money and avoid cost overruns & delays, would the administration be willing to obtain a Full Funding Grant Agreement (FFGA) and/or a Letter of No Prejudice (LNP) before construction? If not, please explain.**

VI. OPERATION AND MAINTENANCE COSTS

The current policy on fare box revenue can cover only up to 30 percent of TheBus operation and maintenance costs. So currently taxpayer operation and maintenance subsidy is about \$130 million. **What are the estimated operation and maintenance costs for the MOS? Taking into consideration that the \$2 fare for rail can be used to transfer onto TheBus or TheBoat as long as it's going one way, what is the estimated taxpayer subsidy?**

In my research, New York City's Metropolitan Transportation Authority (MTA) is facing a huge \$1.2 billion budget deficit and is proposing to drastically cut service on its subways, buses and commuter railroads. According to the November 20, 2008 edition of the New York Times, the MTA is also proposing to raise fares by 23 percent in 2009 and by another 5 percent hike in 2011. Some riders would be hit harder than others. For example, fares for the Long Island bus would increase by 43 percent. All of these proposals have angered passengers. Under the 23 percent fare hike, the public's share to operate and maintain the subway would increase to 83 percent, while the cost of operating local buses borne by riders would rise to 48 percent. **Will the city resort to fare increase or raising property tax to fund operation and maintenance shortfalls of our multi-modal transit system? What measures are needed to prevent large increases in operation & maintenance costs and large fare increases—similar to the experiences of other cities?**

VII. TRANSIT ORIENTED DEVELOPMENT (TOD)

The SLB alignment extends through Mapunapuna which encompasses 150 acres and is owned by a single landowner who is willing to donate land and help build a passenger station. Adding a station in Mapunapuna would increase ridership, save taxpayer money and provide greater opportunities for affordable housing and potential TOD development. There are other TOD opportunities at Stadium Mall, K-Mart across Stadium Mall, the former Costco site (now Target department store), and the Salt Lake Shopping Center.

- **Where are the TOD potentials along the Airport alignment, and how do they compare to the potential sites along the Salt Lake alignment discussed above?**

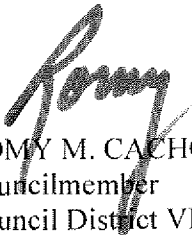
- Why won't the City exhaust all efforts to include a transit station in the Mapunapuna industrial area, since the landowner is willing to assist with the construction of a transit station, which would reduce costs for the City and taxpayers?
- How far along will TOD be in the airport area by the time the MOS is completed in 2018? And 2030?

VI. OTHER CONCERNS AND QUESTIONS

- Page 4-88 of the DEIS says that the guideway could come within 10 feet of some facades along Dillingham Boulevard and would block views from the upper stories of mixed-use buildings Koko Head of Kalihi Street. What will be the impacts to residents of condominiums across Dillingham Shopping Plaza from McNeil Street to Waiakamilo Street?
- Table 3-21 on page 3-39 of the DEIS states that 10 feet of additional right-of-way will be acquired on the makai side of Dillingham, from Puuhale to the Costco Driveway, due to the effects of column placements. Will businesses and residential homes in the area be affected? If so, which ones? Will this require sidewalks to be moved back or sidewalk space to be smaller?

I hope the concerns I have expressed will merit your consideration. On behalf of my constituents, I would like to thank you for the opportunity to express our concerns on this very important transportation project for the residents and taxpayers of Oahu.

Very truly yours,



ROMY M. CACHOLA
Councilmember
Council District VII